


ANGUS Chemical Company

A Subsidiary of The Dow Chemical Company
 350 Louisiana Highway 2
 P.O. Box 1325
 Sterlington, LA 71280
 USA August 28, 2006


RECEIVED

AUG 29 2006

DEPT. OF ENVIRONMENTAL QUALITY
 OFFICE OF ENVIRONMENTAL SERVICES
 PERMIT DIVISION

Federal Express – Overnight Delivery

Louisiana Department of Environmental Quality
 Office of Environmental Services - Environmental Assistance Division
 Public Participation Group
 602 North 5th Street
 Baton Rouge, LA 70802

Subject: **HWC MACT Draft Notice of Intent to Comply**
Public Meeting Public Notification
ANGUS Chemical Company – Sterlington Plant
AI No. 1556 (EPA ID No. LAD020597597)

original to IOHW
 copy to PPG / Ghosh
AI 1556

Public Participation Group,

Attached is a copy of the Draft Notice of Intent to Comply with 40 CFR 63. Subpart
 EEE, the Hazardous Waste Combustors Maximum Available Control Technology rule.
 Also attached is a copy of the public notice that will be used for newspaper, mail, and
 media notices publicizing the public meeting required by October 12, 2006.

The public meeting will be held from 5:30 to 6:30 P. M. on Tuesday, October 10, at the
 East Ouachita Bessie McInnis Recreation Center in Sterlington, Louisiana. The public
 notices for the meeting will be mailed, broadcast, and placed in a local newspaper starting
 on Wednesday, September 6, 2006 and appear in all three formats no later than
 September 10, 2006. A sign with event details will be placed at the Sterlington Plant.

ANGUS will mail the attached public notice to the mailing list provided by LDEQ. It
 will then notify the LDEQ Public Participation Group by email request that the LDEQ
 send the notice to the appropriate email list of interested parties that it maintains. Please
 contact me at (318) 665-5353 or jwsutton@dow.com for more information.

Sincerely,

ANGUS Chemical Company

John W. Sutton
 John W. Sutton
 Environmental Compliance Leader

Attachments

PUBLIC NOTICE

ANGUS Chemical Company, Sterlington Plant
US EPA ID No. LAD020597597 - LDEQ Agency Interest No. 1556
Sterlington, Ouachita Parish, Louisiana

Notification of Public Meeting

In accordance with 40 CFR 63 Subpart EEE, ANGUS Chemical Company (ANGUS) will hold a public meeting regarding the draft Notice of Intent to Comply required by the Hazardous Waste Combustors Maximum Achievable Control Technology (HWC MACT) Rule for its Sterlington Plant located at 350 LA Highway 2 at Sterlington, Ouachita Parish, LA.

The public meeting is scheduled for Tuesday, October 10, 2006 from 5:30 to 6:30 PM at the East Ouachita Bessie McInnis Recreation Center, located at 709 Frances Avenue, in Sterlington. Facility representatives will be available to discuss the anticipated activities for achieving compliance described in the draft NIC and allow the general public and other stakeholders to comment and raise questions.

ANGUS manufactures specialty chemicals at the Sterlington Plant, and it operates two steam generation boilers (No. 6 and 7) that use a characteristic hazardous waste as supplemental fuel as part of the facility. The boilers are therefore subject to the rule.

The draft Notice of Intent to Comply (NIC) is available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov. A paper copy of the NIC may be reviewed at the Ouachita Parish Library located at 1800 Stubbs Avenue in Monroe, Louisiana.

Individuals needing accommodation in order to participate in the public meeting, or requesting additional information, should contact ANGUS representative John W. Sutton at P.O. Box 1325, Sterlington, LA 71280 or (318) 665-5353.

This public notice, including electronic access to the draft NIC, can be viewed at the LDEQ permits public notice webpage at www.deq.state.la.us/news/PubNotice/

ANGUS Chemical Company, Sterlington, Louisiana

Rev. 0
August 30, 2006

ANGUS CHEMICAL COMPANY
Sterlington Plant
AI 1556 – LAD020597597
Sterlington, Ouachita Parish,
Louisiana

BOILERS NO. 6 AND 7
Notice of Intent to Comply
HWC - MACT

Submitted by:
ANGUS Chemical Company
350 Louisiana Highway 2
Sterlington, Louisiana 71280

Draft as of August 28, 2006

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BOILERS NO. 6 AND 7

Notice of Intent to Comply

1.0 General Information

This *Notice of Intent to Comply* presents the plan of ANGUS Chemical Company ("ANGUS"), Sterlington Plant, for complying with Title 40 of the Code of Federal Regulations (40 CFR), Part 63, Subpart EEE (National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors) by reducing or controlling emissions from the combustion of hazardous waste pursuant to the standards of this subpart.

1.1 Facility and Source

ANGUS owns and operates a chemical production facility in Sterlington, Louisiana. The facility is located at 350 Louisiana Highway 2, Sterlington, Louisiana 71280. ANGUS owns and operates Boilers No. 6 and 7 at the facility for generating steam and burning as a supplemental fuel a hazardous waste (NP Heads) generated on site by ANGUS' manufacturing process.

ANGUS will upgrade Boilers No. 6 and 7 systems, as needed, to comply with the National Emission Standards for Hazardous Air Pollutants (NESHAP) from Hazardous Waste Combustors. These national emission standards are documented in 40 CFR, Part 63, Subpart EEE, sometimes referred to as the Hazardous Waste Combustors MACT (HWC-MACT) rule. The ANGUS Sterlington Facility is a "major source" as defined by 40 CFR Section (§) 63.2.

1.2 Emission Controls, Waste Minimization, and Effectiveness

Boilers No. 6 and 7 do not currently have air pollution control equipment because of low levels hazardous air pollutants (HAP's) (particularly metals) in the waste feed to the boilers and because of efficient combustion control that minimizes the formation of HAPs during combustion. Instrumentation and process control systems are used to ensure that efficient combustion occurs. Currently, the boilers are following the RCRA Adjusted Tier 1 approach under 40 CFR 266 (BIF) for RCRA hazardous constituents.

While the combination of process control and current boiler operation is highly effective at minimizing emissions, the NESHAP for hazardous waste combustors may require even more stringent control. The NESHAP standards require compliance with specified limits for the following emission parameters, measured at the stack and corrected to 7% oxygen:

- Dioxin and furan emissions;
- Mercury emissions;
- Particulate matter;
- HCl and chlorine emissions;
- Carbon monoxide emissions;
- Hydrocarbon emissions;
- Semi-volatile metal emissions (e.g., cadmium and lead); and
- Low volatile metal emissions (e.g., arsenic, beryllium, and chromium).

To further control emissions from the boilers in compliance with the NESHAP and to promote waste minimization, ANGUS anticipates the following activities:

- Assessment of the current boiler emissions with respect to the new emissions standards. This assessment will indicate what, if any, additional equipment or controls are needed. At this time only the addition of combustion zone temperature monitoring has been tentatively identified as a required physical change.
- An assessment of the current data acquisition and data management systems and their capabilities with respect to recording and retrieving the information necessary to demonstrate compliance with HWC-MACT has been completed. ANGUS will install a new data acquisition and management system on Boilers No. 6 and 7 that meet the new HWC-MACT requirements.

1.3 Emissions Monitoring

To monitor emissions exiting the stack, ANGUS maintains carbon monoxide and oxygen continuous emissions monitoring systems (CEMS) on the stack. The HWC-MACT does not require any additional continuous emissions monitors. However, in addition to the new data acquisition and management system, ANGUS will install new emissions (stack) monitoring equipment on the boilers.

1.4 Evaluation Criteria

ANGUS is currently reviewing the regulations to determine if any additional modifications need to be made to the boilers to comply with the HWC-MACT.

2.0 Key Activities

As stated above ANGUS is currently reviewing the regulations to determine what, if any, changes or additions to the boilers must be done to comply with the emission control requirements of HWC-MACT. Completion of this analysis is a key activity.

The new data acquisition/management system and new emission monitoring equipment will be installed in 2006 or 2007. Any other changes or additions will be installed and operating by the compliance date of October 14, 2008.

3.0 Summary of Public Meeting (to be completed after the Public meeting)

By [Insert date] ANGUS had made notice of the Public Meeting and had notified the public that a draft of the *Notice of Intent to Comply* was available for review. Public notice was provided through the following:

- Newspaper announcement – Monroe News-Star
- Mailing to the LDEQ facility Mailing list
- Media announcement – [ID the radio or television station]
- Sign – [ID the location of the sign]

Proof of these activities is included in Attachment A.

4.0 **Certification** *(to be completed after the Public meeting)*

As required by 40 CFR §63.1212, ANGUS presents the following certification for the information presented in this *Notice of Intent to Comply* document.

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

 Billy Duncan
 Global Manufacturing Leader
 ANGUS Chemical Company

 Date

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Attachments to the Notice of Intent to Comply

(to be completed after the Public meeting)

Documentation for Proof of Public Notice

- Newspaper announcement - Proof of Publication
- Announcement to facility mailing list
- Media Radio announcement text
- Sign (photograph)

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Attachment A – Documentation for Proof of Public Notice

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